



**Rocky Flats Citizens Advisory Board
Recommendation 2004-2**

Comments on the Rocky Flats Long-Term Stewardship Strategy

Approved January 8, 2004

Letter to:

Mr. Frazer Lockhart
U.S. Dept. of Energy
Rocky Flats Field Office
10808 Hwy. 93, Unit A
Golden, CO 80403

Dear Mr. Lockhart:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to comment on the Rocky Flats Long-Term Stewardship Strategy. We also look forward to working with you on in helping to develop a strong long-term stewardship program that will protect human health and the environment. While we have made general comments on the Rocky Flats Long-Term Stewardship Strategy, this recommendation focuses on specific items we feel should be included or that have been omitted from the strategy document.

We recommend the following:

1. While there is reference to the DOE's policy to use institutional controls as essential components of a defense-in-depth strategy...", we recommend the layering of controls be inserted under "General Site Steward Policies," as follows: "6) The site shall use layered institutional and physical controls in all cases to ensure that if one control fails, another is in place to ensure the public and the environment are protected from residual contamination."
2. On Page 21, the Strategy states "RFFO will therefore analyze life-cycle costs in its proposed remedial actions." No cleanup documents to our knowledge have contained life-cycle cost estimates. We recommend these estimates be made a part of all cleanup documents, and project managers be made aware of the need to examine such costs and use them in a trade-off analysis in all cleanup documents.
3. On Page 21, with respect to funding, we recommend the Department of Energy explore establishing a Trust Fund for long-term stewardship activities, particularly for unexpected contingencies and emergencies.
4. With respect to reviews of the remedies, we know the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA) requires reviews of the remedy every five years. We suggest for the first 5 years after closure, the site conduct such reviews annually to ensure contamination is not migrating into the environment and public health and environment continue to be protected.
5. With respect to contingency planning and emergency response:
 - a. We recommend the site work closely with the RFCAB and other representatives of the public to develop a contingency plan and an emergency response plan to assure the public that both the area under DOE's control and the future Rocky Flats National Wildlife Refuge remain safe and that controls are in place in the event of an emergency or in the event that contaminants are found to be migrating into the environment.

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- b. The list of emergency contacts on page 64 does not include news media outlets. The news media can have a pivotal role in warning the public about emergencies. We recommend that TV, newspaper and radio media outlets be added to the list of emergency contacts. We also recommend that DOE plan with the media how emergency notification will be performed.
- c. We also recommend that RFCAB or its successor be added to the list of emergency contacts.
- d. We recommend that during the periodic review process, the Department of Energy should review its contingency and emergency response plan.

7. With respect to public involvement, in the Strategy's section on the long-term stewardship budget, there is no money set aside for a public involvement process. While we understand that public involvement with the site may decrease after closure, we recommend the Site develop a plan for public involvement and a budget for public involvement be developed for post-closure activities.

We also have the following comments and questions for your consideration. What is your vision of the role that stakeholders and the community will have post-closure? What types of public involvement activities do you plan to have in place post-closure? What is your vision for the role the community will play in determining what types of public involvement activities may be most useful?

Again, thank you for the opportunity to comment on the Rocky Flats Stewardship Strategy. We look forward to your comments and replies.

Cordially,

Victor Holm
Chair

cc: Jessie Roberson, DOE
Mike Owen, DOE
Dave Geiser, DOE
Ray Pliennes, DOE
Steve Gunderson, CDPHE
Mark Aguilar, EPA
Dean Rundle, FWS
David Abelson, RFCLoG

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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